WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

BY: Joshua Bachrach, Esquire joshua.bachrach@wilsonelser.com BY: Heather J. Austin, Esquire heather.austin@wilsonelser.com Independence Square West The Curtis Center, Suite 1130 East Philadelphia, PA 19106 215.627.6900/215.627.2665(f)

Attorneys for Defendant, Reliance Standard Life Insurance Company

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

Sylvia Rodriguez,

Civil Action

Plaintiff,

: No.:2:12-cv-4810-DMC-JAD

V.

Reliance Standard Life Insurance

Company,

: NOTICE OF DEFENDANT'S MOTION

: FOR SUMMARY JUDGMENT

Defendant.

TO: Stephen R. Bosin, Esquire 70 Grand Avenue, Suite 200 River Edge, NJ 07661

PLEASE TAKE NOTICE that on June 17, 2013, Defendant, Reliance Standard Life
Insurance Company, by and through its attorneys, WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP, shall move before the United States District Court for the District
of New Jersey for summary judgment in favor of Reliance Standard.

PLEASE TAKE FURTHER NOTICE that in support of said Motion, Reliance Standard shall rely on its supporting Statement of Undisputed Facts and Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that oral argument is requested in the event that this Motion is opposed.

A proposed form of Order is submitted for the Court's convenience.

## WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

## BY: <u>s/Heather J. Austin</u>

Joshua Bachrach, Esquire joshua.bachrach@wilsonelser.com Heather J. Austin, Esquire heather.austin@wilsonelser.com Independence Square West The Curtis Center, Suite 1130 East Philadelphia, PA 19106 215.627.6900/215.627.2665(f)

Attorneys for Defendant, Reliance Standard Life Insurance Company

Date: May 24, 2013